

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

EARLENE CARR,)	
)	
Plaintiff,)	
)	
v.)	Case No:
)	
HL MOTOR GROUP, INC.,)	
HIGHLIGHT MOTOR FREIGHT USA, INC.,)	
OLD REPUBLIC INSURANCE COMPANY,)	
GALLAGHER BASSETT SERVICES, INC.,)	
and OGNJEN MILANOVIC,)	
)	
Defendants.)	

AFFIDAVIT OF NYRON JEALALL

I, Nyron Jealall, under penalties as provided by law pursuant to the Federal Rules of Civil Procedure, certify that the statements set forth herein are true and correct and that, if called upon to testify in the above-captioned case, I could competently testify to the following statements based upon my personal knowledge.

1. I am the Claims Manager of HL Motor Group, Inc., a trucking company located in Ontario, Canada.
2. In my position as Claims Manager, I have become familiar with the history, organization and activities of HL Motor Group, Inc., a company that is engaged in providing transportation, warehousing and distribution services.
3. HL Motor Group, Inc. is a company that is organized and existing under the laws of Ontario, Canada.

4. HL Motor Group, Inc.'s principal place of business, offices and distribution center are located in Ontario, Canada.

5. HL Motor Group, Inc. is not incorporated nor does it have a principal place of business in the State of Oklahoma.

6. In my position as Claims Manager, I am also familiar with its corporate records and documents, which include records of HL Motor Group, Inc.'s affiliations, ownership and leasing of commercial trucking vehicles and trailers, employees and records related to transportation and delivery.

7. Highlight Motor Freight USA, Inc., is a company affiliated with but not a part or a subsidiary of HL Motor Group, Inc.

8. Highlight Motor Freight USA, Inc. is a company that is organized and existing under the laws of State of New Jersey.

9. Highlight Motor Freight USA, Inc.'s principal place of business, offices and distribution center are located in Parsippany, New Jersey.

10. Highlight Motor Freight USA, Inc. is not incorporated nor does it have a principal place of business in the State of Oklahoma.

11. I have reviewed the Complaint in this matter, which generally alleges that plaintiff sustained property damages resulting from an August 8, 2020 motor vehicle collision with a vehicle operated by Ognjen Milanovic ("Mr. Milanovic") who was employed by "HL Motor Group, Inc. and/or Highlight Motor Freight USA, Inc."


12. On August 8, 2020, while engaged in the activity described in the Complaint in this matter, Mr. Milanovic was an employee of HL Motor Group, Inc.

13. On August 8, 2020, while engaged in the activity described in the Complaint in this matter, Mr. Milanovic was not, nor has he ever been an employee of Highlight Motor Freight USA, Inc.

14. I reviewed Mr. Milanovic's employment file and confirmed that he is a citizen of and resides in Ontario, Canada.

15. I also reviewed HL Motor Group, Inc.'s records related to vehicle ownership and found that the tractor operated by Mr. Milanovic at the time of the August 8, 2020 motor vehicle accident and described in the plaintiff's Complaint was owned by HL Motor Group, Inc.

16. HL Motor Group, Inc.'s records related to vehicle ownership also indicate that the trailer operated by Mr. Milanovic at the time of the August 8, 2020 motor vehicle accident was leased by Highlight Motor Freight, Inc.


Nyron Jealall